1	LAW OFFICES OF NEIL JON BLOOMFIELD		
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7			
8	UNITED STATES DISTRICT COURT FOR THE		
9	NORTHERN DISTRICT OF CALIFORNIA		
10			
11	MARK MORRISON.) No. CV 08 1945 EMC	
12	Plaintiff,)	
13	vs.	DECLARATION OF NEIL JON BLOOMFIELD IN SUPPORT OF	
14	ULI ZANGPO,	MOTION TO EXTEND THE DATE OF THE INITIAL CASE MANAGEMENT	
15	Defendant.) CONFERENCE	
16		_)	
17	 I, Neil Jon Bloomfield, declare as follows: I am the attorney for Defendant Uli Zangpo. 		
18			
19	2. Defendant is requesting that the date of the Case Management Conference be extended		
20	so that the Court has the opportunity to determine whether it has jurisdiction over the parties prior to		
21	the Case Management Conference, and so that the Court has the opportunity to determine whether the		
22	agreement of the parties that no discovery or depositions will be permitted supersedes the parties'		
23	discovery rights and obligations under the Federal Rules of Civil Procedure and the Northern District		
24	Civil Local Rules.		
25	3. On June 16, 2008, I asked Plaintiff, though his counsel, whether he would stipulate to		
26	change the date of the Initial Case Management Conference. As of late afternoon on June 17, I have		
27	had no response.		
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- 4. If the date of the Initial Case Management Conference is not changed, the parties will either be in violation of Federal and Local Rules if they do not exchange initial disclosures, or alternatively will be in violation of the agreement between the parties if they do exchange initial disclosures. Furthermore, if ther Court grants Defendant's motion to dismiss for lack of jurisdiction, both the parties and the Court will have wasted substantial time and effort preparing for and conducting the initial Case Management Conference.
- 5. The only previous time modification in this case has been Plaintiff granting Defendant an extension of time to respond to the Complaint from May 14, 2008 to June 11, 2008.
- 6. If this motion is granted, the Initial Case Management Conference (and its related dates) will be extended. There are not yet any other events scheduled for this case.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 17th day of June, 2008, at San Rafael, California.

/s/		
	Neil Jon Bloomfield	